

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PAVEL ZISSU and AISE ZISSU,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No.: 15-cv-02394
	)	
IH2 PROPERTY ILLINOIS, L.P., a	)	
Delaware Limited Partnership and	)	Judge John Z. Lee
THR BROKERAGE IL INC. d/b/a	)	
INVITATION HOMES, a Delaware	)	
Limited Partnership,	)	
	)	
Defendants.	)	

**MOTION TO RE-OPEN LAWSUIT TO ENFORCE SETTLEMENT AGREEMENT**

NOW COME Plaintiffs, PAVEL ZISSU and AISE ZISSU, (hereinafter referred to as “Plaintiffs”), by and through their attorneys, ANTHONY J. PERAICA & ASSOCIATES, LTD, and move this Honorable Court to enforce the settlement agreement and in support thereof states as follows:

1. Plaintiffs had filed a lawsuit regarding the destruction and loss of plaintiffs’ personal property as a result of the items having been removed and discarded by the Defendants.
2. The negotiations between the parties, with the assistance of Magistrate Judge Kim, resulted in a settlement agreement.
3. The settlement agreement was signed by all parties on March 14, 2016.
4. Pursuant to the settlement, plaintiff filed an agreed stipulation to dismiss [Docket #60], which was entered by the court on March 14, 2016 [Docket #61].

5. Plaintiffs seek to have the lawsuit re-opened for the sole purpose of enforcing the settlement agreement.

WHEREFORE, the Plaintiffs, PAVEL ZISSU and AISE ZISSU, respectfully request that this Honorable Court re-open the lawsuit for the sole purpose of enforcing the settlement agreement and for such other relief as this Court deems just and equitable.

Respectfully submitted,  
PAVEL ZISSU and AISE ZISSU

By: /s/ Anthony J. Peraica  
One of Plaintiffs' Attorneys

Attorneys for Plaintiffs  
Anthony J. Peraica, Esq., ARDC No. 6186661  
Anthony J. Peraica & Associates, Ltd.  
5130 S. Archer Ave.  
Chicago, Illinois 60632  
(773) 735-1700